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## North Coast Regional Water Quality Control Board

August 26, 2013

Mr. Joe LaGro  
Director of Construction  
Bridgestone Retail Operations  
5949 Sherry Lane, Suite 1570  
Dallas, TX 75225

Dear Mr. LaGro:

**Subject:** Notice of Violation for the Bridgestone Retail Operations Construction Project Storm Water Permit Coverage, 2730 Santa Rosa Avenue, Santa Rosa, Sonoma County, WDID No. 149C365352

**File:** Firestone Construction Site – 2730 Santa Rosa Avenue, Santa Rosa, Sonoma County

Your project is enrolled for coverage under and subject to the requirements of the Statewide General Permit for Discharges of Storm Water from Construction Activities (Construction General Permit). The Construction General Permit contains enforceable requirements intended to control the discharge of pollutants from construction projects. On Tuesday, June 25, 2013, North Coast Regional Water Quality Control Board (Regional Water Board) staff received information from City of Santa Rosa storm water staff regarding turbid water discharging from the Firestone construction site, located at 2730 Santa Rosa Avenue in Santa Rosa. City staff noted that the entire site was graded and exposed, with the only storm water best management practices (BMPs) consisting of an insufficiently rocked construction entrance, a single line of improperly installed straw wattles along the street frontage and gravel bags in the gutter along Burt Street. Significant stormwater runoff was discharging offsite into storm drains after a day of steady, - light to moderate- rainfall that totaled 1.20 inches. Turbidity measured approximately 30 feet south of, and downstream of, the construction site was 375 NTUs. Without immediate Storm Water Pollution Prevention Plan (SWPPP) updates and implementation of revised erosion and sediment control practices on the site, subsequent storms will likely result in additional discharges of sediments from the site into waters of the State.

Sediment discharges can cause or contribute to violation of applicable water quality standards. The Construction General Permit requires facility operators to prohibit or minimize the discharge of pollutants in storm water and authorized non-storm water, through the development and implementation of BMPs. These BMPs help to control pollutants using Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT).

The following picture depicts conditions observed by City staff at several different locations at the Firestone construction site.



June 25, 2013, Firestone Site in Santa Rosa - Photograph taken by City of Santa Rosa staff



June 25, 2013, Firestone site in Santa Rosa - Photograph taken by City Of Santa Rosa staff



June 25, 2013 Firestone site in Santa Rosa - Photograph taken by City Of Santa Rosa staff

Compliance with the Construction General Permit includes ensuring that you have an adequate SWPPP onsite, and that you implement the provisions of the SWPPP through BAT and BCT. This includes directing all runoff generated onsite to receiving waters without eroding construction areas onsite.

Within 10 days of the date of this letter, you must submit an updated copy of your SWPPP to the State Water Resources Control Board SMARTS database; the updated SWPPP must fully describe measures implemented and/or proposed to be implemented to eliminate or

significantly minimize the discharge of sediment laden stormwater runoff from the Firestone construction project. Please include an implementation schedule for the site repairs to ensure that these measures are fully implemented. Failure to take these steps in a timely manner may result in further enforcement actions.

If you have any questions, please contact Paul Keiran of my staff at (707) 576-2753 or at [Paul.Keiran@waterboards.ca.gov](mailto:Paul.Keiran@waterboards.ca.gov).

Sincerely,

David F. Leland, PE  
Watershed Protection Division Chief

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cc: Heaven Moore, City of Santa Rosa Stormwater, Utilities Dept.  
69 Stony Circle, Santa Rosa 95401